

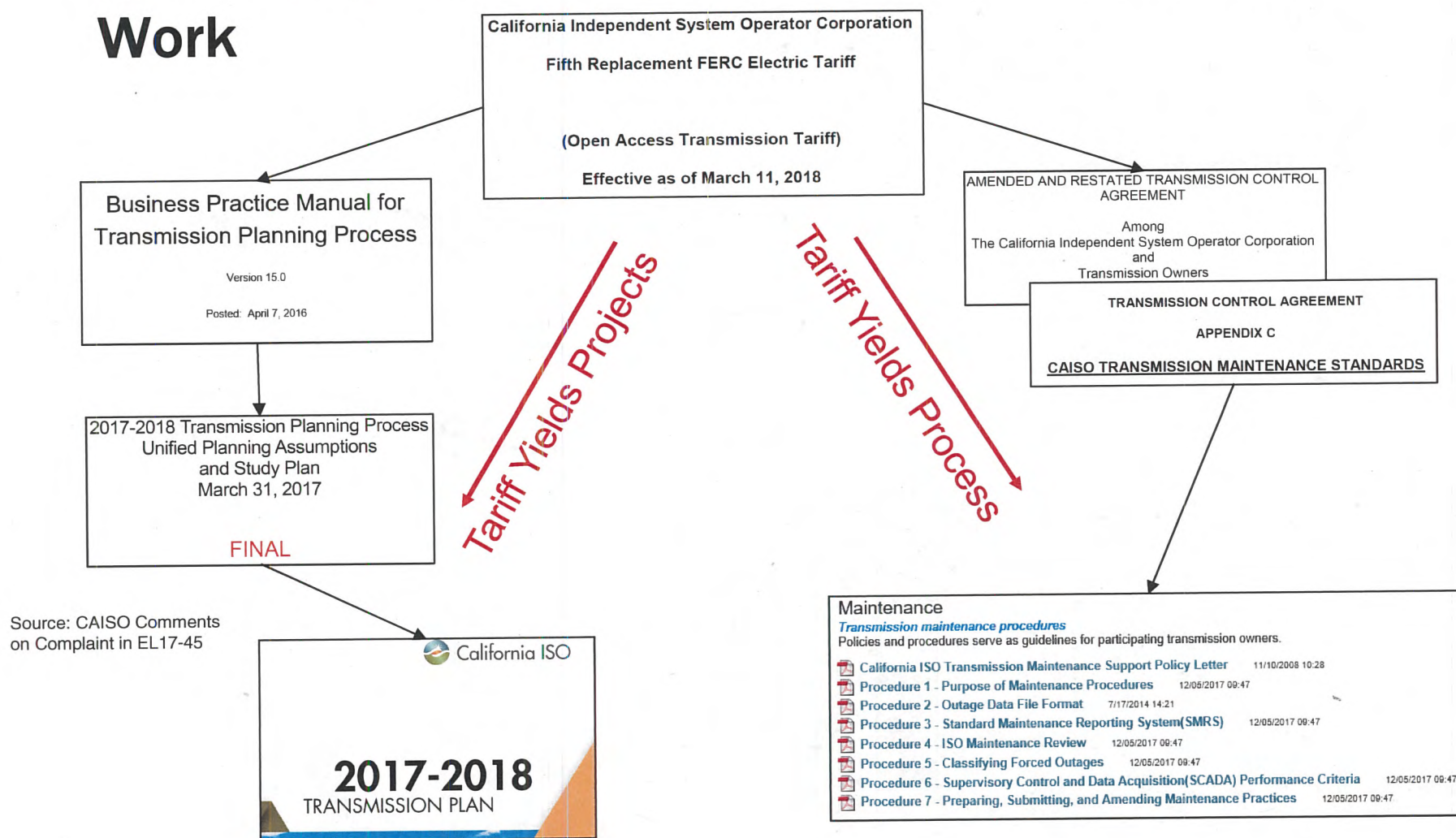


Transparency and Process Recommendations

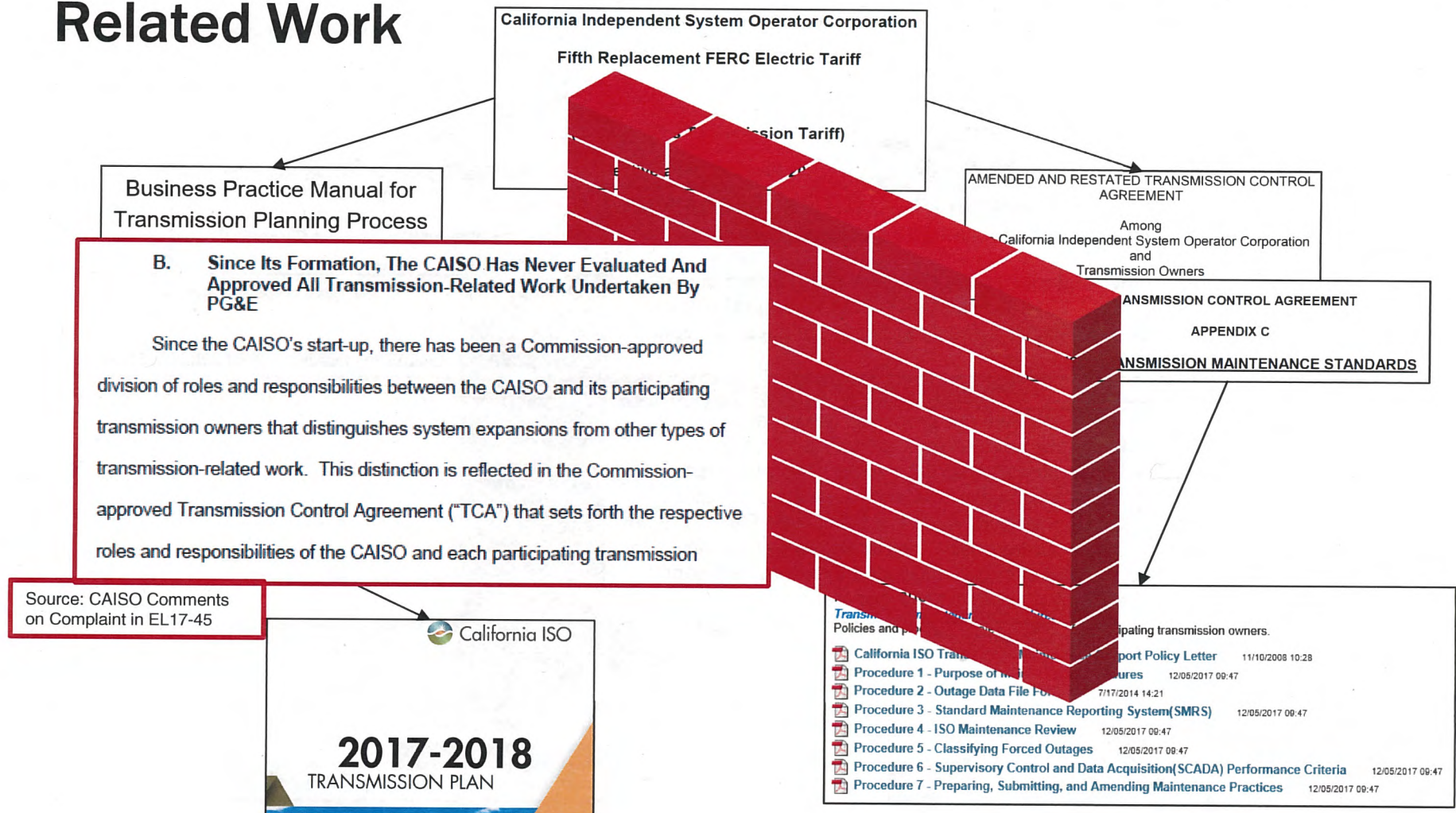
David Dockham
Assistant General Manager
5/1/2018



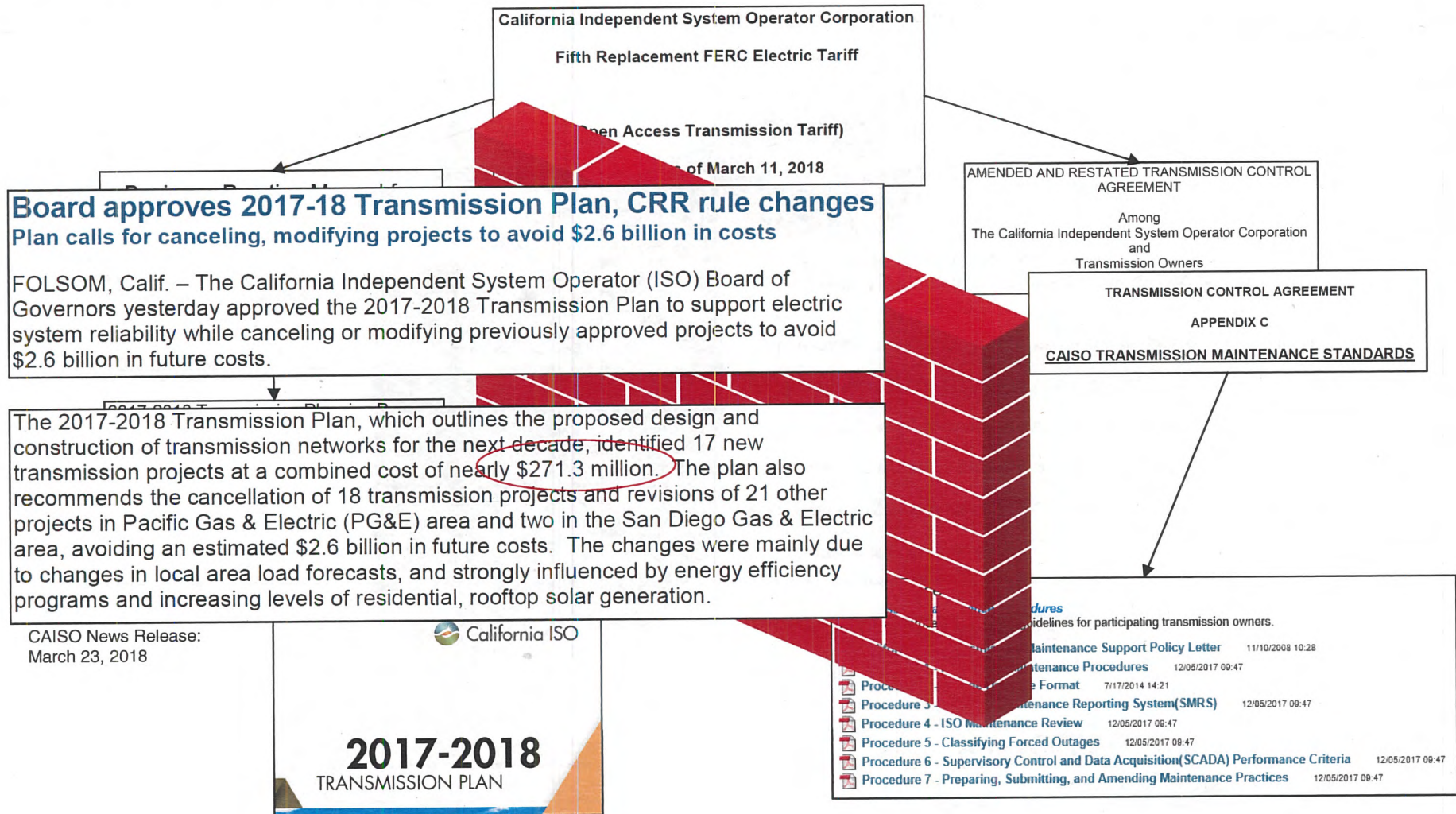
System Expansion vs other Transmission Related Work



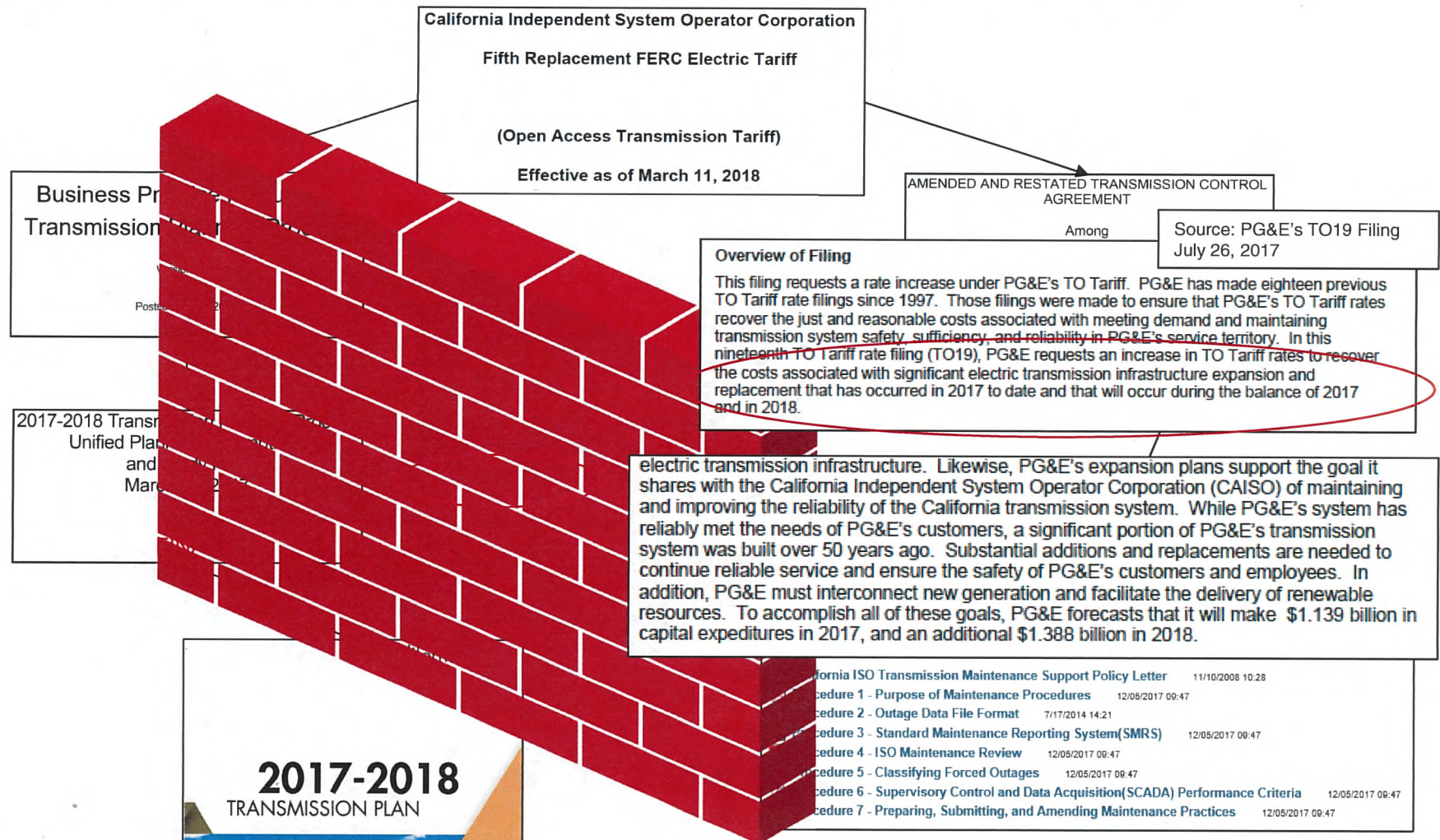
CAISO View of System Expansion vs other Transmission Related Work



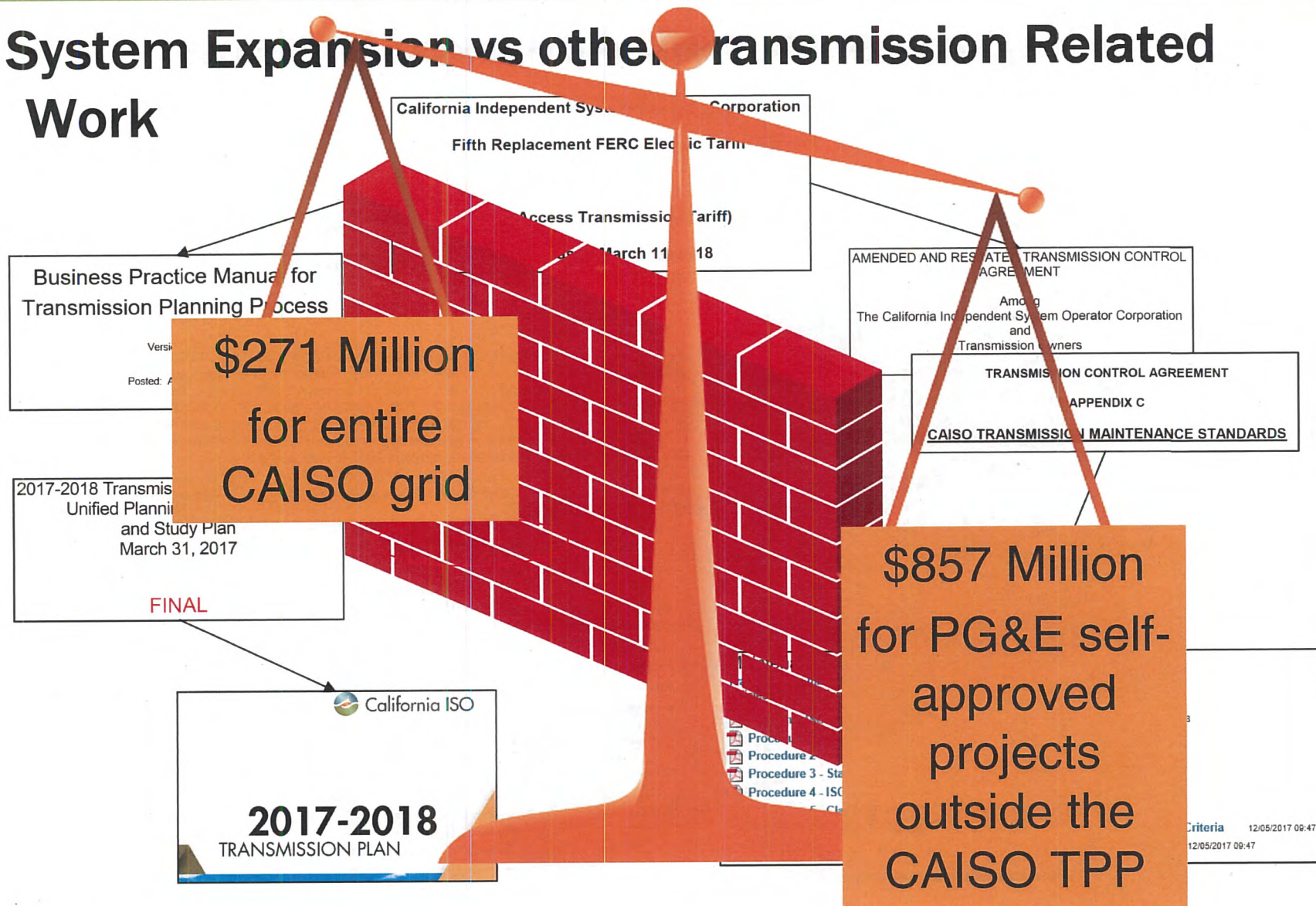
Result of CAISO TPP Process



CAISO TPP Ignores IOU Self Approved Projects



System Expansion vs other transmission Related Work



Recommended Solution

Reform the CAISO Transmission Maintenance Process

- Identify projects and associated costs as opposed to just maintenance procedures
- Comply with Order 890 Cost, Transparency and Coordination principles
- Use the TPP process as a guide

California Independent System Operator Corporation
Fifth Replacement FERC Electric Tariff
(Open Access Transmission Tariff)
Effective as of March 11, 2018

AMENDED AND RESTATED TRANSMISSION CONTROL AGREEMENT

Among
The California Independent System Operator Corporation
and
Transmission Owners

TRANSMISSION CONTROL AGREEMENT









APPENDIX C

CAISO TRANSMISSION MAINTENANCE STANDARDS

Maintenance

Transmission maintenance procedures

Policies and procedures serve as guidelines for participating transmission owners.

	California ISO Transmission Maintenance Support Policy Letter	11/10/2008 10:28
	Procedure 1 - Purpose of Maintenance Procedures	12/05/2017 09:47
	Procedure 2 - Outage Data File Format	7/17/2014 14:21
	Procedure 3 - Standard Maintenance Reporting System(SMRS)	12/05/2017 09:47
	Procedure 4 - ISO Maintenance Review	12/05/2017 09:47
	Procedure 5 - Classifying Forced Outages	12/05/2017 09:47
	Procedure 6 - Supervisory Control and Data Acquisition(SCADA) Performance Criteria	12/05/2017 09:47
	Procedure 7 - Preparing, Submitting, and Amending Maintenance Practices	12/05/2017 09:47

TCA Appendix C – Maintenance Practices

5.2. PREPARATION OF MAINTENANCE PRACTICES

5.2.1. TRANSMISSION LINE CIRCUIT MAINTENANCE

As may be appropriate for the specific Transmission Line Circuits under the CAISO's Operational Control, each PTO's Maintenance Practices shall describe the Maintenance activities for the various attributes listed below:

5.2.1.1. OVERHEAD TRANSMISSION LINES

5.2.1.2. UNDERGROUND TRANSMISSION LINES

5.2.2. STATION MAINTENANCE

As may be appropriate for the specific Stations under the CAISO's Operational Control, each PTO's Maintenance Practices shall describe Maintenance activities for the various attributes listed below:

TCA Appendix C – Maintenance Practices

5.2.3. DESCRIPTIONS OF MAINTENANCE PRACTICES

Each PTO's Maintenance Practices shall include a schedule for any time-based Maintenance activities and a description of conditions that will initiate any performance-based activities. The Maintenance Practices shall describe the Maintenance methods for each substantial type of component and shall provide any checklists/report forms, which may be required for the activity. Where appropriate, the Maintenance Practices shall provide criteria to be used to assess the condition of a Transmission Facility. Where appropriate, the Maintenance Practices shall specify condition assessment criteria and the requisite response to each condition as may be appropriate for each specific type of component or feature of the Transmission Facility.

- If these practices exist, they are not made publicly available
- If condition assessments and the requisite response to each condition are the basis for PG&E's self approved capital projects there is no public PG&E or CAISO based process to review, comment or participate in the development of solutions (responses)

TCA - Maintenance Standards

5.3. REVIEW AND ADOPTION OF MAINTENANCE PRACTICES

5.3.1. INITIAL ADOPTION OF MAINTENANCE PRACTICES

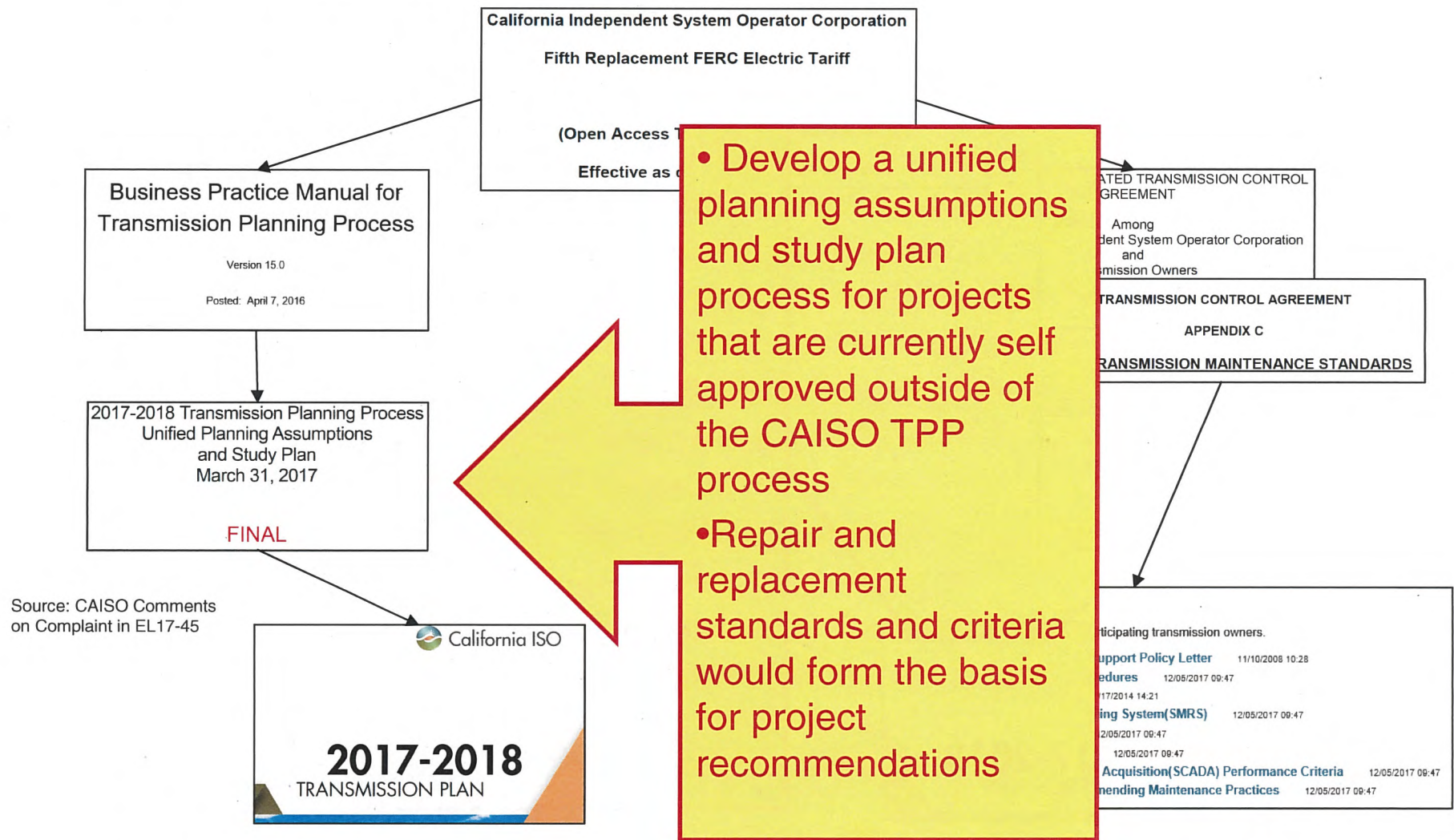
In conjunction with its application to become a PTO, each prospective PTO shall provide to the CAISO its proposed Maintenance Practices which comply with the requirements set forth in this Appendix C and Section 14.1 of the Transmission Control Agreement. This information shall provide sufficient detail for the CAISO to assess the proposed Maintenance Practices.

14.1. CAISO Determination of Standards.

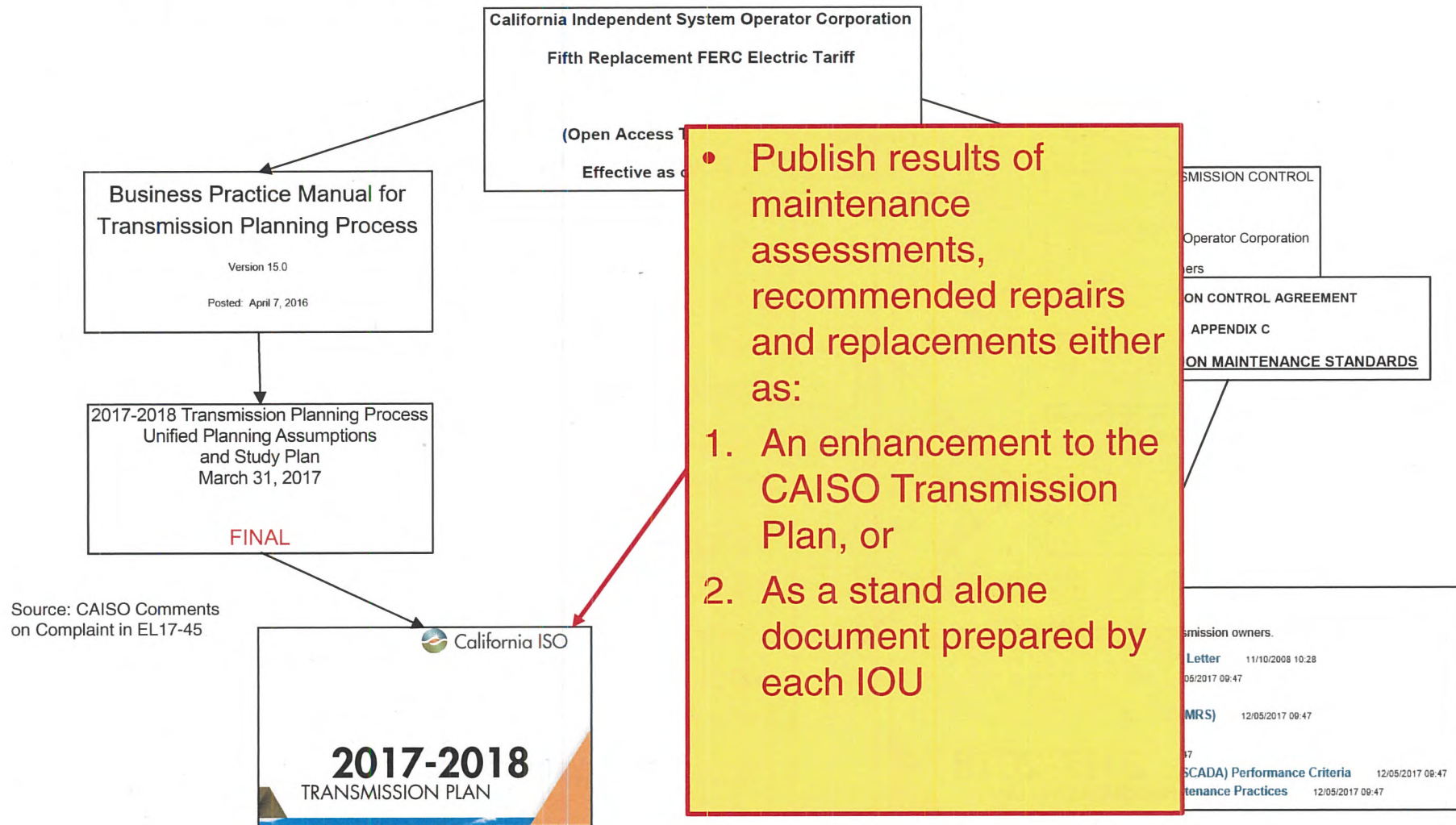
The CAISO has adopted and shall maintain, in consultation with the Participating TOs through the Transmission Maintenance Coordination Committee, and in accordance with the requirements of this Agreement, the standards for the maintenance, inspection, repair, and replacement of transmission facilities under its Operational Control in accordance with Appendix C. These standards, as set forth in Appendix C, are and shall be performance-based or prescriptive or both, and provide for high quality, safe, and reliable service and shall take into account costs, local geography and weather, the Applicable Reliability Criteria, national electric industry practice, sound engineering judgment, and experience.

- Not clear where repair and replacement standards exist
- Not clear that these standards, if they exist, are being used as the basis for PG&E's self approved projects and/or how CAISO and PG&E coordinate approvals

Recommended Solution (cont.)



Recommended Solution (cont.)



Recommended Solution (cont.)

- Joint complainants are prepared to share draft tariff language to accomplish the recommended solution (later today or when appropriate)
 - Complainants appreciate FERC scheduling this technical conference to address the issues being discussed today
 - While we don't believe the PTO's actions of self approving projects or SCE's recent TMCR proposal is consistent with Order 890 requirements, we do believe CAISO's current TPP processes can be used as a guide for bringing transparency to the current non-transparent self approved project process and that a mutually agreeable solution is achievable

